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7 Attorney for Jesus Castelo-Meza

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,  
11 Plaintiff,  
12 v.  
13 CASTELO-MEZA ET AL,  
14 Defendant.  
15

Case No. 2:19-mj-511-DJA

**STIPULATION TO CONTINUE  
PRELIMINARY HEARING**  
(Fourth Request)

16 IT IS HEREBY STIPULATED AND AGREED, by and between  
17 Nicholas A. Trutanich, United States Attorney, and Kevin D. Schiff, Assistant United States  
18 Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public  
19 Defender, and Raquel Lazo, Assistant Federal Public Defender, counsel for Jesus Castelo-  
20 Meza; Thomas F. Pitaro, Esq., counsel for Ivan Agustin Castelo-Meza; Yi Lin Zheng, Esq.,  
21 counsel for Jesus Castelo-Carranza; and Monti J. Levy, Esq., counsel for Karolina Moya, that  
22 the Preliminary Hearing currently scheduled on January 6, 2020 at 4:00 pm, be vacated and  
23 continued to a date and time convenient to the Court, but no sooner than seventy-five (75) days.

24 This Stipulation is entered into for the following reasons:

25 1. The parties are still working to resolve this matter short of an indictment. Since  
26 the last requested continuance, defense counsel have reviewed the plea agreement with their

1 respective clients. However, the parties require additional time to attempt to work on counter  
2 offers and other plea agreement details.

3 2. Jesus Castelo-Meza is detained and agrees to the continuance.

4 3. Ivan Agustin Castelo-Meza is detained and agrees to the continuance.

5 4. Jesus Castelo-Carranza is detained and agrees to the continuance.

6 4. Karolina Moya is not detained and agrees to the continuance.

7 5. Additionally, denial of this request for continuance could result in a miscarriage  
8 of justice.

9 This is the fourth request for continuance filed herein.

10 DATED this 27th day of December, 2019.

11  
12 RENE L. VALLADARES  
Federal Public Defender

NICHOLAS A. TRUTANICH  
United States Attorney

13  
14 */s/ Raquel Lazo*  
By \_\_\_\_\_

*/s/ Kevin D. Schiff*  
By \_\_\_\_\_

15 RAQUEL LAZO  
Assistant Federal Public Defender

KEVIN D. SCHIFF  
Assistant United States Attorney

16  
17 */s/ Thomas P. Pitaro*  
By \_\_\_\_\_  
18 THOMAS P. PITARO, ESQ.  
Counsel for Ivan Agustin Castelo-Meza

*/s/ Monti Levy*  
By \_\_\_\_\_  
MONTI J. LEVY, ESQ.  
Counsel for Karolina Moya

19  
20 */s/ Yi Lin Zheng*  
By \_\_\_\_\_  
21 YI LIN ZHENG  
Counsel for Jesus Castelo-Carranza

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 CASTELO-MEZA ET AL,

7 Defendant.

Case No. 2:19-mj-511-DJA

**ORDER**

9  
10 Based on the Stipulation of counsel and good cause appearing,

11 IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled on  
12 Monday, January 6, 2020 at the hour of 4:00 p.m., be vacated and continued to  
13 Monday, March 23, 2020 at the hour of 4:00 p.m.

14 DATED this 27th day of December, 2019.

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17 Daniel J. Albregts  
18 United States Magistrate Judge  
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